

EXHIBIT H

**SUBMISSION OF YASSIN ABDULLAH KADI TO THE
DEPUTY ATTORNEY GENERAL OF SWITZERLAND, MR
CLAUDE NICATI, FURTHER TO THE MEETING AT THE
SWISS EMBASSY IN RIYADH ON 1 JULY 2003**

1. INTRODUCTION

At the meeting at the Swiss Embassy in Riyadh, Saudi Arabia, on 1 July 2003, the Deputy Attorney General of Switzerland, Mr Claude Nicati ("Mr Nicati") met Mr Yassin Kadi in the presence of his legal team. Mr Nicati requested Mr Kadi and his legal team to provide a detailed explanation of the issues raised at the meeting. This memorandum sets out the evidence as requested by Mr Nicati:

- 1.1 **PART I** of this memorandum relates to certain transfers authorised by Mr Kadi from the account of Caravan Development Group Limited (account 10257) at Faisal Finance, Geneva, for the benefit of Wael Hamza Jeleidan (for convenience referred to as "Mr Jeleidan") between 24 February 1998 and 3 August 1998 in the total sum of US\$1.25 million. Mr Kadi testified at the 1 July 2003 meeting that he authorised all these transfers for the sole purpose of giving financial support for prefabricated housing for students and ancillary buildings for the Al Eman University in Sanaa, Yemen.

- 1.2 **PART II** of this memorandum contains clarification and supplemental evidence on certain issues raised by Mr Nicati during the 1 July 2003 meeting.

Following the meeting on 1 July 2003, Mr Kadi's legal team and his staff have urgently undertaken substantial investigations in various jurisdictions around the world including in Yemen, Sudan, Saudi Arabia, Jordan, Turkey and Switzerland. During these investigations a significant number of relevant documents have been obtained in various different languages, including Turkish and Arabic. Following that meeting, Mr Kadi's legal team has also met Mr Jeleidan. Mr Jeleidan has co-operated with the legal team including by authorising access to corporate documents for Maram Travel Importation and Exportation Trading Limited Company (for convenience "Maram") as well as banking documents relating both to Mr Jeleidan's personal accounts and the account of Maram. Mr Kadi's legal team has arranged for many of these documents to be translated. All the foregoing work has been undertaken as a matter of urgency as a result of the short deadline imposed at the 1 July 2003 meeting by Mr Nicati.

It must be noted at the outset that these investigations have been impeded, in part, by the very recent removal by the Turkish government authorities of crucial documents relating to Maram, a company that had a central role in the Al Eman University housing project. These documents were removed in late June or early July 2003, at around the same time as the 1 July 2003 meeting with Mr Nicati, when representatives of the Turkish Ministry of Finance visited Ms Semra Sonmez, the accountant in Istanbul who formerly represented Maram. The Turkish government authority that removed these documents is HESAP YZMANLARI KURULU, a division of MALIYE BAKANLIGE (Ministry of Finance) in Karakoy, Istanbul. Due to this, Mr Kadi's legal team has not been able to access all documents relevant to the transfers. This memorandum has, therefore, been prepared, and the evidence collated, despite, and subject to, these constraints.

A paginated file of supporting documentation is provided with this memorandum together with, wherever necessary, translations.